

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
V.)	12 CR 172-2
)	
Chadia Abuied,)	
Defendant)	

AGREED MOTION TO MODIFY CONDITIONS OF BOND TO ALLOW TRAVEL TO WISCONSIN

Counsel for Chadia Abueid, on supervised release, hereby files his agreed motion to Allow her to travel to Wisconsin, the Dells, between July 17 and July 20, 2017 and in support thereof states:

1. Defendant will be travelling with her sister and mother visiting from Palestine and her young son;
2. That Ms. Abueid has had this court's permission to travel to Brazil, Florida and Palestine on previous occasions, even before her plea;
3. That the government has no objection to this planned travel, per Sunil. Harjani, Assistant United States Attorney;
4. That the government has filed no alleged violations of probation against defendant;

5. Counsel is informed that the probation department, per Jason Crawford, objects to the travel on the ground that the defendant owes unpaid restitution and therefore should not be allowed what the officer calls "leisure travel;"
6. That counsel originally "misfiled" this request at an earlier date and that if the court wishes to hear more information, Mr. Sunil Harjani, AUSA and undersigned counsel are available tomorrow morning at the court's convenience;
7. That counsel for Abueid explained to Assistant United States Attorney Harjani the objection of probation and he nonetheless has no objection in allowing Ms. Abueid travelling to the Dells next week.

Wherefore, defendant prays that she be permitted to travel to Wisconsin, the Dells, from July 17 to July 20, 2017, with the usual conditions that she inform probation of her address and itinerary.

Respectfully Submitted,

s/Robert G. Clarke, Attorney

Robert G. Clarke, Attorney
Attorney for Chadia Abueid
123 W. Madison, Suite 1500
Chicago, Ill. 60602

